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May 14, 2021

Via Electronic Filing

Clerk, United States District Court
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: Stanley Markowitz v. Costco Wholesale Corporation
Docket No.: BER-L-2645-21
Our File No.: COST-135

Dear Sir/Madam:

Enclosed please find Petition for Removal on behalf of defendant, Costco Wholesale Corporation. Please file same. By copy of this letter, we are advising our adversary of this Petition.

Thank you for your courtesy in this regard.

Respectfully submitted,

LAWRENCE M. BERKELEY
A Member of the Firm

LMB/yo
Enclosure.

cc: Clerk, Superior Court of New Jersey, Bergen County (via electronic filing)
Arnold E. Reiter, Esq. (via email only)

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Attorneys for Defendant, Costco Wholesale Corp.

Our File No.: COST-135

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

STANLEY MARKOWTIZ,

Plaintiff

vs.

**COSTCO WHOLESALE
CORPORATION,**

Defendant.

CIVIL ACTION NO.

PETITION FOR REMOVAL

Petitioner, Costco Wholesale Corporation, by its attorneys, WEINER LAW GROUP LLP, respectfully petitions the United States District Court for the District of New Jersey as follows:

1. This case was commenced on April 21, 2021 in the Superior Court of New Jersey, Law Division, Bergen County. Suit is identified in the Superior Court as Stanley Markowitz v. Costco Wholesale Corporation, Docket No. BER-L-2645-21. (See Exhibit A).

2. Costco Wholesale Corporation first received a copy of the Complaint on or about April 21, 2021 when counsel for Plaintiff served the Complaint on Costco Wholesale Corporation at the warehouse where the incident took place.

3. The filing of this Petition for Removal is timely because it is filed within thirty days of the date Costco Wholesale Corporation first received notice of the lawsuit.

4. Plaintiff's Complaint in the Superior Court of New Jersey, Law Division, Bergen County, asserts damages of a non-specified amount, but in a sum not less than one million (\$1,000,000) dollars together with related costs and disbursements. Plaintiff, allegedly sustained injuries at the Costco Wholesale Corporation warehouse as a result of falling inside of the warehouse. As such, defendant Costco Wholesale Corporation believes the amount in controversy exceeds \$75,000, exclusive of interest and costs.

5. Costco Wholesale Corporation is informed and believes that Plaintiff is an individual citizen of the State of New Jersey. Defendant/petitioner, Costco Wholesale Corporation, is a Washington corporation and its principal place of business is 999 Lake Drive, Issaquah, Washington 98027.

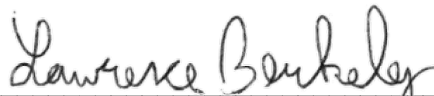
6. Accordingly, this action is removable to this Court pursuant to 28 U.S.C. § 1441.

WHEREFORE, Petitioner, Costco Wholesale Corporation, defendant in the action described herein, which is currently pending in the Superior Court of the State of New Jersey, Law Division, Bergen County, Docket No. BER-L-2645-21, prays that this action be removed therefrom to this Court.

Defendant, Costco Wholesale Corporation

Dated: May 14, 2021

BY: _____

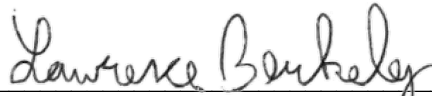


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(LMB -7706)

I certify that a true copy of the Complaint filed in the Superior Court of the State of New Jersey, County of Bergen, along with a copy of the Summons issued to this defendant, is annexed hereto as Exhibit A.

Dated: May 14, 2021

BY: _____



LAWRENCE M. BERKELEY
(LMB -7706)